

**CHARLES M. SMITH AND BOSSIER
RIVERSIDE, L.L.C.**

117649
CAUSE NO. _____ SEC _____

VS

26th JUDICIAL DISTRICT COURT

**RIVERWALK ENTERTAINMENT,
L.L.C., LOUISIANA RIVERWALK, L.L.C.,
AND THE CITY OF BOSSIER CITY,
LOUISIANA**

BOSSIER PARISH, LOUISIANA

**PLAINTIFFS' FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

**TO: RIVERWALK ENTERTAINMENT, L.L.C.
LOUISIANA RIVERWALK, L.L.C.,
THE CITY OF BOSSIER CITY, LOUISIANA**

Plaintiffs, CHARLES M. SMITH and BOSSIER RIVERSIDE, L.L.C., request that defendants answer under oath the following interrogatories, and further request that defendants produce the following documents and things.

INTERROGATORY NO. 1:

State the name, address and telephone number of each person providing information and documents responsive to these requests.

INTERROGATORY NO. 2:

State the name, address and telephone number of each person you believe has knowledge of any fact that supports any claim, defense or cause of action that may make in this lawsuit, and set forth, in summary form, the subject and substance of the knowledge you believe each such person has.

INTERROGATORY NO. 3:

Identify each and every document that you believe supports any claim, defense or cause of action that you may make in this lawsuit.

INTERROGATORY NO. 4:

Identify each fact witness you intend to call as a witness at the trial and for each such witness, state the substance of his expected testimony.

FILED
JUL 21 2005
[Signature]
26th JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

INTERROGATORY NO. 5:

Identify each expert witness you intend to call as a witness at the trial, and for each such expert, state the subject matter on which the expert is expected to testify, the opinions he is expected to give and the substance of the facts to which he is expected to testify.

INTERROGATORY NO. 6:

Identify each document you intend to use as an exhibit at trial.

INTERROGATORY NO. 7:

State whether you have ever been a party to any civil litigation of any nature over matters relating to the Louisiana Boardwalk Project? If so, state the nature of the litigation, the caption and number of the proceeding, the court in which the proceeding was filed, the date of filing, and the disposition of the proceeding.

INTERROGATORY NO. 8:

Identify every written, electronic, recorded or oral communication you have had relating to the sale, purchase or acquisition by any other means by any defendant of property owned or formerly owned by Charles M. Smith and used or intended for use in the Louisiana Boardwalk Project, including property commonly are known as Lots 8, 9 and 10 located west of Block 6, West McCormick Annex, Bossier City, Bossier Parish, Louisiana and Lots 1 - 5, East McCormick Annex, of Block 17, Bossier City, Bossier Parish, Louisiana and state the date, nature, content of and the identity of all parties to each such communication.

INTERROGATORY NO. 9:

Identify every meeting you have had with plaintiffs or other defendants relating to the sale, purchase or acquisition by any other means by any defendant of property owned or formerly owned by Charles M. Smith and used or intended for use in the Louisiana Boardwalk Project, including property commonly are known as Lots 8, 9 and 10 located west of Block 6, West McCormick Annex, Bossier City, Bossier Parish, Louisiana and Lots 1 - 5, East McCormick Annex, of Block 17, Bossier City, Bossier Parish, Louisiana and state the date, location, nature and content of and the identity of all persons attending each such meeting.

REQUEST FOR PRODUCTION NO. 1:

Produce copies of all written or recorded statements by any witnesses identified in your responses to Interrogatory Nos. 2 and 4.

REQUEST FOR PRODUCTION NO. 2:

Produce copies of all documents identified in your responses to Interrogatory Nos. 3 and 6.

REQUEST FOR PRODUCTION NO. 3:

Produce copies of all written reports rendered by any experts identified in your response to Interrogatory No. 5.

REQUEST FOR PRODUCTION NO. 4:

Produce copies of all notes, transcripts, recordings or other documents that in any way relate to or otherwise evidence any communications identified in your response to Interrogatory No. 8.

REQUEST FOR PRODUCTION NO. 5:

Produce copies of all notes, minutes, transcripts, recordings or other documents that in any way relate to or otherwise evidence the meetings identified in your response to Interrogatory No. 9.

Respectfully submitted:

McMICHAEL, MEDLIN, D'ANNA
& WEDGEWORTH, L.L.C.

By: 

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